

EXHIBIT 2

NOTICE OF CLASS ACTION SETTLEMENT**THIS IS A COURT-AUTHORIZED NOTICE**

Scott Easom, et al., v. U.S. Well Services, LLC
United States District Court for the Southern District of Texas
Case No. 4:20-cv-02995

TO: ALL PERSONS EMPLOYED BY U.S. WELL SERVICES, LLC BASED OUT OF THE FACILITIES IN SAN ANGELO, TEXAS; BRYAN, TEXAS, OR PLEASANTON, TEXAS AND WHO WERE INVOLUNTARILY TERMINATED (EXCEPT FOR CAUSE) BETWEEN MARCH 5, 2020 AND APRIL 4, 2020 AND WHO WERE NOT REHIRED WITHIN 6 MONTHS.

RE: PROPOSED SETTLEMENT OF CLASS ACTION LAWSUIT

[FIRST AND LAST NAME]’S ESTIMATED SHARE OF THE SETTLEMENT: \$_____.

A proposed settlement for up to [REDACTED] has been reached between Class Representatives, Scott Easom, Adrian Howard, and John Nau (“Plaintiffs”), and Defendant, U.S. Well Services, LLC (“USWS”), in the above-referenced lawsuit (“the Lawsuit”). Class Members are former employees of USWS who fall under the description above. Plaintiffs filed suit alleging a violation of the Worker Adjustment and Retraining Notification Act of 1988 (“WARN Act”). USWS denied and continues to deny Plaintiffs’ allegations.

The Court has granted preliminary approval of the parties’ proposed class action settlement. This Notice is to advise you of how you can: (1) submit a claim for a portion of the settlement monies or (2) object to the proposed settlement. Please read this Notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
<u>SUBMIT A CLAIM FORM</u>	<p>Receive a settlement payment. Give up your right to sue USWS separately about the legal claims made in this lawsuit.</p> <p>If you submit a timely and valid Claim Form (enclosed), you will be entitled to participate in the settlement. Even if you do not submit a Claim Form, you will give up your rights to sue USWS separately about the legal claims in this lawsuit.</p>
<u>OBJECT</u>	<p>Submit a written objection to the Court.</p> <p>If you disagree with the proposed settlement, you may submit an objection. If the Court agrees with your objection, the parties can choose whether to withdraw the settlement or change its terms. If the Court rejects your objection, you will be bound by and entitled to participate in the settlement.</p>
<u>DO NOTHING</u>	<p>Receive no payment. Give up rights.</p>

These rights and options, and the deadlines to exercise them, are explained in this Notice.

EXHIBIT 2

BASIC INFORMATION

1. Why did I get this notice?

You are receiving this notice and received a separate notice earlier this year because you were employed by USWS and were based out of the USWS facilities located in San Angelo, Texas; Bryan, Texas; or Pleasanton, TX; were involuntarily terminated between March 5, 2020 and April 4, 2020 (as opposed to terminated for cause or separated voluntarily); and were not rehired within six months of your termination.

You have a right to know about a proposed class action settlement of this Lawsuit, and about all of your options, before the Court decides whether to give final approval of the proposed class action settlement.

This Notice explains the Lawsuit, the proposed class action settlement, your legal rights, what benefits are available, who is eligible for them, how to get them, and how to object to the proposed class action settlement.

2. What is this lawsuit about?

This lawsuit claims USWS violated the WARN Act by failing to provide 60 days' notice to employees in advance of terminating them as part of the mass layoffs that took place between March 5, 2020 and April 4, 2020. The WARN Act is a federal law which generally requires employers with 100 or more full-time employees to provide advance notification to employees at least 60 calendar days before any planned plant closings or mass layoffs. The WARN Act also includes exceptions to the 60-day notice requirement, including the "unforeseen business circumstances" exception, which allows for the reduction of the notice period.

The Plaintiffs in this lawsuit assert that USWS failed to provide the 60-day advance notice and claim that USWS did not provide sufficient notice under the WARN Act. USWS disputes Plaintiffs' claims and asserts that USWS provided as much notice as practicable because of unforeseen business circumstances that arose during the first quarter of 2020.

3. What is a class action?

You are one of 282 members of this Class Action. A "class action" lawsuit is a case where one or more people called Plaintiffs serve as "Class Representatives," and sue on behalf of themselves and all the other people who have similar claims. The people together are a "Class," and the individuals are all "Class Members." The person or entity that is being sued, in this case USWS, is called the "Defendant." One court resolves the claims of all Class Members, except for those who properly exclude themselves from the Class. Judge Lee Rosenthal is in charge of this class action.

4. Why is there a settlement?

Plaintiffs and Defendant agreed to settle this Lawsuit. That way, they avoid the cost of a trial and any appeals, and former and current employees of USWS who are Class Members can receive compensation. USWS and Plaintiffs engaged in extensive settlement negotiations to settle this Lawsuit, which led to the proposed class action settlement described in this Notice. The parties thoroughly investigated the facts and the relevant laws and regulations pertaining to this Lawsuit. Plaintiffs' lawyers believe that the proposed class action settlement is fair and reasonable and in the best interest of the Class because the proposed class action settlement provides for payment to Class Members and avoids the considerable risks and delays involved in continuing to litigate the Lawsuit. Although the Plaintiffs believed their claims were valid and USWS believed it had valid defenses, both parties also recognized the risk of losing and agreed that settling the claims was in the best interest of all involved.

For the purposes of the proposed class action settlement, everyone who fits the following description is a Class Member:

All U.S. Well Services employees based out of the production facilities in Bryan, Texas, San Angelo, Texas, and Pleasanton, Texas, who were terminated between March 5, 2020 and April 4, 2020, excluding employees who: (1) were rehired by U.S. Well Services within a six-month period from their date of termination, (2) voluntarily terminated their employment, or (3) were discharged for cause.

THE SETTLEMENT BENEFITS – WHAT YOU GET

5. What does the settlement provide?

USWS has agreed to pay up to [REDACTED] to settle this class action Lawsuit (the “Gross Settlement Amount”). After deductions noted below, the remainder of the settlement amount will be used to pay the claims of Class Members who submit a valid claim form. The portion of the Gross Settlement Amount that is available for payment to Class Members who submit a valid claim form is referred to as the “Net Settlement Amount.”

The Net Settlement Amount will be the Gross Settlement Amount minus the following payments which are subject to approval by the Court: (1) Attorneys’ Fees not to exceed 40% of the Gross Settlement Amount [REDACTED] and litigation costs and expenses not to exceed [REDACTED] to Class Counsel; (2) a Class Representative Enhancement Payment in the amount of [REDACTED] to each of the three named Plaintiffs (Scott Easom, Adrian Howard, and John Nau) for their services in this Lawsuit including responding to discovery and appearing for depositions; and (3) Settlement Administration Costs to ILYM Group, Inc. (“Settlement Administrator”).

Settlement Class Members will be entitled to receive payment under the Settlement (“Individual Settlement Payment”) of their pro rata share of the Net Settlement Amount (“Individual Settlement Share”) based on their typical compensation and benefits received prior to their termination. If you timely submit the proper claim form, you will receive your share of the Net Settlement.

You Individual Settlement Payments will be subject to normal W-2 deductions in accordance with IRS rules based on a W-4 form you must fill out. USWS will pay for any employer share of Social Security and Medicare withholdings.

If the Court grants final approval of the Settlement, Individual Settlement Payments will be mailed to the Settlement Class Members who timely submitted a proper claim form at the address that is on file with the Settlement Administrator. **If the address to which this Class Notice was mailed is not correct, or if you move after you receive this Class Notice, you must make sure to provide your correct mailing address to the Settlement Administrator in a timely fashion, to ensure receipt of payment to which you may be entitled.**

6. How much is my payment and how can I claim it?

Based on preliminary calculations, your share of the settlement is approximately \$_____. In order to receive this payment, you must submit the attached claim form so that it is received **no later than DATE** to:

ILYM Group, Inc.
MAILING ADDRESS:
PHONE:

EMAIL:

You may submit your claim form in any of the following ways:

1. Sign electronically using the link and code provided.
2. Sign and email a clear image of your completed claim form to [CLAIMS ADMINISTRATOR EMAIL]
3. Signing and mailing the form by U.S. Mail to [CLAIMS ADMINISTOR'S ADDRESS].

These payments will not be made unless and until the Court grants final approval of the settlement and any appeals have been completed.

The Claims Administrator can only deliver payment to people who timely submit valid claim forms that are actually received. If you want proof that the Claims Administrator received your claim form, you should obtain a U.S. Postal Service delivery confirmation, retain the confirmation page if you submitted your form electronically, or request a reply if you submit your claim form via email.

7. When would I get my payment?

The Court will hold a hearing on [DATE/TIME] to decide whether to grant final approval of the proposed class action settlement. If the proposed class action settlement is approved, it is possible that somebody may appeal. Information about the progress of the settlement will be available by contacting the Claims Administrator by phone, email or writing to the address provided in Section 6. Payments will not be made until unless and until the court grants final approval of the settlements and appeals are exhausted.

8. What am I giving up to get a payment or stay in the Class?

As a member of the Class, regardless of whether you submit a settlement claim form, you will irrevocably release, acquit, waive, and forever discharge USWS of and from any and all claims, rights, demands, complaints, causes of action, obligations or liability of any and every kind, damages (including liquidated damages), penalties, costs or fees, including but not limited to all professional fees and costs incurred in relation to the Litigation, that were asserted in the Litigation, including WARN Act claims.

OBJECTING TO THE SETTLEMENT

9. How do I tell the Court that I do not like the settlement?

If you are a Class Member, you can object to the proposed class action settlement if you do not like any part of it. You can give reasons why you think the Court should not approve it. The Court will consider your views. To object, you must notify the Court in writing that you object to the proposed class action settlement in this Lawsuit. You must include your name, address, telephone number, your signature, and state the reasons you object to the proposed class action settlement.

In order for your objection to be considered by the Court, it must be **sent to the Court, Class Counsel, and counsel for USWS at the addresses set forth below and postmarked by no later than the [Response Deadline]**.

Court	Class Counsel	Counsel for USWS
Clerk of the Court – U.S. District Court for the Southern District of Texas 515 Rusk St. Houston, Texas 77002	Gabriel A. Assaad, Esq. Matthew S. Yeziarski, Esq. McDonald Worley, P.C. 1770 St. James Place Suite 100 Houston, TX 77056 gassaad@mcdonaldworley.com matt@mcdonaldworley.com	David Korn, Esq. Phelps Dunbar, LLP 365 Canal Street Suite 2000 New Orleans, LA 70130 David.korn@phelps.com

10. Do I have a lawyer in this case?

Yes. The Court has appointed the Plaintiffs' lawyers in this case to represent the Class Members ("Class Counsel"), including you. If you have any questions or require additional information, you may contact Class Counsel. Those lawyers are:

CLASS COUNSEL	
Galvin Kennedy Kennedy Law Firm, LLP 2925 Richmond Ave. Suite 1200 Houston, TX 77098 (713) 425-6445 Telephone (888) 535-9271 Fax HELP@kennedyattorney.com	Gabriel A. Assaad Matthew S. Yeziarski McDonald Worley, P.C. 1770 St. James Place Suite 100 Houston, TX 77056 (713) 523-5500 Telephone (713) 523-5501 Fax gassaad@mcdonaldworley.com matt@mcdonaldworley.com

You also have the right to retain a separate lawyer, at your own expense.

Class Counsel has worked on this lawsuit for four years so far without receiving any payments at all for their work or reimbursement for their out-of-pocket expenses. Class Counsel will ask the Court for attorneys' fees up to [REDACTED] and costs up to [REDACTED]. This amount will pay Class Counsel for all time spent working on the proposed class action settlement to date, as well as any additional time and expenses incurred in the future finalizing the proposed class action settlement. Your estimated payment already takes into consideration these fees, litigation costs and settlement administration costs. USWS has agreed not to oppose this request. The Court may award less than the amounts requested. Class counsel's attorneys' fees and costs are part of the Gross Settlement Amount for the proposed class action settlement.

THE COURT'S FINAL APPROVAL HEARING

11. When and where will the Court decide whether to approve the settlement?

The Court will hold a Final Approval Hearing on [DATE/TIME] at the United States District Court for the Southern District of Texas, at 515 Rusk Avenue, Houston, Texas 77002, Room 11535. You may attend, but are not required to. At this hearing, the Court will consider whether the proposed class action settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. If you object in the manner

provided above, then you, or your attorney, may appear at the Final Approval Hearing to present arguments. At or after the hearing, the Court will decide whether to approve the proposed class action settlement and how much to pay to Class Counsel. We do not know how long these decisions will take.

IF YOU DO NOTHING

12. What happens if I do nothing at all?

If you are considered a Class Member, as defined in Section 4 above, and you do nothing, you will not receive payment but will be bound by the proposed class action settlement and will not be able to sue USWS in the future regarding the issues relating to this case. You must timely submit a claim form as described in Section 6 to be paid.

GETTING MORE INFORMATION

13. Are there more details about the settlement?

Yes. This Notice summarizes the most important aspects of the proposed class action settlement. You may read the Complaint and other pleadings in the Lawsuit, including the Settlement Agreement, during regular office hours at the office of the Clerk of the United States District Court for the Southern District of Texas - Houston Division or online via the electronic system called PACER.

PLEASE DO NOT CALL THE COURT, THE CLERK, OR USWS OR ITS COUNSEL ABOUT THIS SETTLEMENT.

YOU MAY CALL THE SETTLEMENT ADMINISTRATOR AT THE FOLLOWING TOLL-FREE NUMBER IF YOU HAVE QUESTIONS: NUMBER

YOU MAY ALSO CONTACT CLASS COUNSEL IF YOU HAVE ANY QUESTIONS.

Date: **DATE**, 2024

THE HONORABLE LEE H. ROSENTHAL

DATE OF MAILING: **DATE**, 2024

CLAIM FORM INSTRUCTIONS

To receive money from the proposed class action settlement in the above-referenced action, you must fill out this Claim Form and submit it so that it is received no later than **DATE** by:

ILYM Group, Inc.

PHONE:

EMAIL:

MAILING ADDRESS:

You may return the Claim Form in three ways:

1. Complete the forms electronically using the code provided.
2. Mail the completed forms via United States first class mail to the address above.
3. Take a clear photo of the completed forms and email them to: **[CLAIM ADMIN EMAIL]**

However, if ILYM Group, Inc. determines that your Claim Form was not received or was post-marked after the deadline, the **sole acceptable proof** that you submitted the Claim Form to the above-listed address within the time period shall be either (1) **an original receipt from the United States Postal Service evidencing the mailing of such Claim Form by certified mail**; (2) **a copy of the confirmation page if you submitted the form electronically**; (3) **an email reply from the claims administrator that your Claim Form was received**. As a result, you should strongly consider keeping evidence that you timely submitted your Claim Form.

CLAIM FORM
DEADLINE: _____, 2024

Please provide the following information (please print or type):

Your Name: _____
(Please Print) First, Middle, Last Name

Last 4 Digits of your Social Security No.: _____

Current Address: _____
Street or P.O. Box

City State Zip Code

Telephone No.: _____

Email Address(es): _____

I have read and understand the Official Court Notice of Class Action Settlement and certify that I am a current or former employee of USWS who was terminated between March 5, 2020 and April 4, 2020 and who was based out of the production facilities in Bryan, Texas, San Angelo, Texas, and Pleasanton, Texas and who: (1) was not rehired by U.S. Well Services within a six-month period from their date of termination; (2) did not voluntarily terminate my employment; and (3) was not discharged for cause.

By signing below, I understand that I am making a claim as a Class Member and that I am releasing certain claims described in the Notice of Class Action Settlement. I certify that the information submitted by me is true and correct, subject to prosecution for perjury.

Date

Signature

If you change your address after submitting this Claim Form but before receiving money from the proposed class action settlement, please send a letter to the address provided above to ensure that the settlement check is forwarded to you.